

MAY 06 2002

Michael N. Milby, Clerk of Court

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ENRON CORPORATION
SECURITIES LITIGATION

§
§ Civil Action No. H-01-3624
§ (Consolidated)
§

DEFENDANT LOU PAI'S
MOTION TO DISMISS CONSOLIDATED AMENDED COMPLAINT

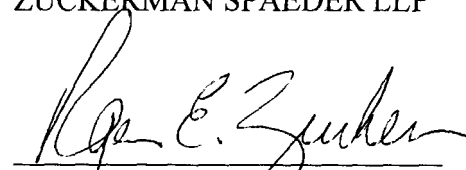
TO THE HONORABLE MELINDA F. HARMON, UNITED STATES DISTRICT JUDGE:

Pursuant to the Private Securities Litigation Reform Act and Federal Rules of Civil Procedure 9(b) and 12(b)(6), Defendant Lou Pai hereby moves the Court to dismiss the claims against him in the above-captioned matter for failure to plead with the requisite particularity and failure to state a claim upon which relief can be granted. Support for this motion is more fully set forth in an accompanying memorandum of points and authorities, as well as in the brief filed today on behalf of certain Enron Defendants relating to Enron disclosures, in which Mr. Pai hereby joins.

Respectfully submitted,

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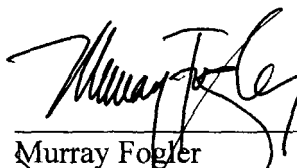
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Date: May 8, 2002